

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 19-cv-11764 (AT) (KHP)

ARLENE DELGADO,

Plaintiff,

v.

DONALD J. TRUMP FOR PRESIDENT, INC.,
TRUMP FOR AMERICA, INC.,
SEAN SPICER, individually,
REINCE PRIEBUS, individually, STEPHEN
BANNON, individually,

Defendants,

-----/

LOCATION: Remote Audio-Video Communication

DATE: October 22, 2024

TIME: 9:30 a.m. - 1:11 p.m.

DEPOSITION OF MICHAEL GLASSNER

Taken remotely before Elena Robaina,
Florida Professional Reporter, Notary Public in and
for the State of Florida at Large, pursuant to
Notice of Taking Deposition filed in the above
case.



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I N D E X

E X A M I N A T I O N S

MICHAEL GLASSNER

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1 today?

2 A. No.

3 Q. Okay. Fine.

4 Are you currently working,
5 Mr. Glassner, on the Trump 2024 election effort?

6 MR. GAVENMAN: Objection. Objection.
7 That is outside the scope that was allowed
8 for this deposition. His current status of
9 what he's doing has no bearing on the
10 declaration that was filed. This is not
11 within the scope of what was allowed.

12 So you can -- you already asked his
13 occupation and what he's doing, but as to
14 specifics, that's not within the scope of
15 this deposition.

16 MS. DELGADO: Mr. Gavenman, I think
17 that was you speaking because you're not
18 spotlighted. The topics of the
19 deposition -- of the declaration that were
20 allowed for this deposition, Mr. Glassner
21 in Paragraph 1 identifies himself as a
22 former employee of the Donald J. Trump for
23 President Campaign and then gives a recap
24 of his resumé through 2020.

25 I completely disagree that asking him



1 MR. GAVENMAN: You already asked me
2 that question, Ms. Delgado. Please.

3 MS. DELGADO: Yes.

4 MR. GAVENMAN: It's not a -- it's not
5 a proper -- you're asking my basis for a
6 statement is not a proper deposition
7 question at anytime. I'm not a --

8 MS. DELGADO: It's an inflammatory
9 accusation.

10 MR. GAVENMAN: -- I'm not being
11 deposed. And I already answered the
12 question. Please. We have three hours.
13 Let's get the --

14 MS. DELGADO: It's an inflammatory
15 accusation.

16 MR. GAVENMAN: Let's get the questions
17 that matter.

18 MS. DELGADO: It's an inflammatory
19 accusation.

20 BY MR. GAVENMAN:

21 Q. Let's get into the declaration.
22 Mr. Glassner, I'd like you to turn to paragraph 11
23 of your declaration.

24 MS. DELGADO: I'd also like to state
25 for the record and before we turn to



paragraph 11, the fact that Mr. Glassner is working on the Trump campaign was already noted by Mr. Gavenman -- by Mr. Glassner -- I mean, by Mr. Glassner's own counsel when he was trying to avoid the scheduling of this deposition. So apparently it was relevant for scheduling but not -- because he asked about it at the actual deposition, further meriting sanctions.

BY MS. DELGADO:

Q. Okay. So Mr. Glassner, if you could look at paragraph 11 --

MR. GAVENMAN: You know he's doing some work with the Trump campaign. He can -- he can acknowledge that, he's doing some work for the Trump campaign, but we're not getting into anything beyond that. There you go, there's your answer. Okay. But we're not getting into that or anything else.

MS. DELGADO: I'm sorry. I'm sorry.

MR. GAVENMAN: But is that -- is that all -- is that all you were trying to get? That's fine.

MS. DELGADO: I'm sorry. I'm going to



1 seek sanctions on that as well. Did you
2 just answer for your client? It sounds
3 like you did. You just gave an
4 answer representing your client.

5 MR. GAVENMAN: No, I'm representing --
6 I'm representing for you that he's doing
7 some work for the Trump campaign and we
8 will stipulate to that --

9 MS. DELGADO: Mr. Gavenman --

10 MR. GAVENMAN: -- but we will not go
11 further.

12 MS. DELGADO: Mr. Gavenman, I'm going
13 to caution --

14 MR. GAVENMAN: Yes, Ms. Delgado.

15 MS. DELGADO: -- you not to answer on
16 behalf of your client. I will seek severe
17 rule of evidence sanctions on you again if
18 you do that. Do not answer on behalf of
19 your client. You are not in the deposition
20 seat.

21 MR. GAVENMAN: I most certainly did
22 not, Ms. Delgado. Please continue.

23 MS. DELGADO: Yes, you did. The
24 record will be clear. I'll get the
25 transcript.



1 **A.** Okay.

2 **Q.** -- you refer to the "scandalous or
3 embarrassing leaks." What was scandalous or
4 embarrassing?

5 MR. GAVENMAN: Objection.

6 THE WITNESS: I don't see -- you know,
7 again, I don't understand the question.

8 BY MS. DELGADO:

9 **Q.** Okay. Mr. Glassner, paragraph 8 you
10 refer to "scandalous or embarrassing leaks of
11 certain private and sensitive information."

12 **A.** Right.

13 **Q.** What was scandalous --

14 **A.** I'm describing the NDA in that
15 paragraph, why the NDAs were required.

16 **Q.** Okay. Did I --

17 **A.** That's what -- that's what that
18 paragraph addresses.

19 **Q.** Okay. I guess this is a -- a good
20 point to clarify then, your declaration appears to
21 give two grounds for the arbitration action against
22 me, which is the intended threat in the lawsuit in
23 paragraph 10 and the tweets in paragraph 11.

24 **A.** Uh-huh.

25 **Q.** Is that correct?



1 Q. And on that vein, I believe you stated
2 earlier that, same as in Ms. Denson's case, you
3 made the determination with Mr. Rosen to proceed
4 with the arbitration action?

5 A. Yes.

6 Q. Okay. And whom did you consult with,
7 apart from Mr. Rosen, about that arbitration
8 action?

9 A. No one that I recall.

10 Q. Even as it was ongoing. I don't mean
11 solely the determination to begin the initiation of
12 it.

13 MR. GAVENMAN: Objection. That's
14 beyond the scope of this deposition and
15 beyond the scope of this affidavit.
16 Anything after filing is beyond the scope.
17 You can certainly ask about the filing.

18 MS. DELGADO: But his declaration is
19 not limited to the filing.

20 MR. GAVENMAN: Well, his declaration
21 is limited to the filing as it pertains to
22 the arbitration. There's obviously other
23 material in here, but none of it is beyond
24 the arbitration other than the mere
25 background fact that he was working in



1 at least within your extremely narrow
2 scope, does include the 2017 filing, you're
3 now saying that I can't ask about the
4 one-page 2017 filing form.

5 MR. GAVENMAN: No, that's not what I'm
6 saying.

7 MS. DELGADO: Yes you are because the
8 damages is listed in the claim form on
9 page 1.

10 MR. GAVENMAN: Sure. So you can ask
11 about the claim --

12 MS. DELGADO: You're saying that too
13 is now not permitted.

14 MR. GAVENMAN: Go ahead. Go ahead,
15 ask your question. I'll object as it -- as
16 it comes in. Go ahead.

17 BY MS. DELGADO:

18 Q. Mr. Glassner, let me ask again, if
19 you're able to see the amended demand from 2017, it
20 has a damages, sir, of 1.5 million. Are you able
21 to see that?

22 A. I see that. Yes.

23 Q. How was that calculated?

24 A. I don't recall.

25 Q. Okay. Was it you; was it counsel? Do



1 you recall?

2 A. I don't recall.

3 Q. Okay. And for that filing, if you
4 look at the next page, the exhibit, which states
5 the ground of the filing, the claim was that the
6 tweets or tweet had caused damages, correct?

7 A. That's what it says.

8 Q. And how would discussion of Miller
9 being White House communications director cause
10 damages to the campaign?

11 MR. GAVENMAN: Objection.

12 And caution you not to reveal any
13 privileged information. To the extent you
14 can answer that without revealing
15 privileged information, you may do so.

16 BY MS. DELGADO:

17 Q. I'm not asking you to tell me what
18 discussions you had with your attorney,
19 Mr. Glassner. You agreed with this. I'm asking
20 you, how was the campaign damaged?

21 A. I just said I don't recall how the
22 damages were calculated.

23 Q. I don't mean how they were calculated,
24 the number. How was the campaign damaged?

25 MR. GAVENMAN: So this is the



1 privileged information mixed in there, but
2 that's outside the scope of the deposition
3 what was -- what happened in a -- in the
4 damages clause of a separate arbitration.

5 BY MS. DELGADO:

6 Q. Mr. Glassner, if there were scandalous
7 and embarrassing leaks as you said in paragraph 8,
8 how do you explain rehiring Jason Miller?

9 MR. GAVENMAN: Excuse me. Objection.
10 Way outside the scope.

11 MS. DELGADO: No.

12 MR. GAVENMAN: And way outside the
13 scope of this deposition. It is. There's
14 a form and foundation problem to your
15 question, but it's also outside the scope
16 the way you framed the last part of the
17 question.

18 MS. DELGADO: No. He speaks of
19 scandalous and embarrassing leaks on
20 paragraph 8 of his declaration.

21 MR. GAVENMAN: He already explained
22 that's -- okay. He already explained
23 that's not what's being said in
24 paragraph 8. It simply is not.

25 BY MS. DELGADO:



1 Q. What was being said, Mr. Glassner, in
2 paragraph 8? Because your attorney is speaking for
3 you here. Also highly improper.

4 A. I answered this --

5 Q. Can you answer me?

6 A. -- I answered this previously. The
7 purpose of paragraph 8 is to explain why NDAs are
8 required.

9 Q. And where is scandalous or
10 embarrassing, either of those words, found in the
11 NDA?

12 A. I don't recall.

13 Q. Okay. I'll -- take your time. Look
14 at the NDA. I think it's --

15 MR. GAVENMAN: Exhibit 7.

16 MS. DELGADO: Sure.

17 BY MS. DELGADO:

18 Q. Take your time, Mr. Glassner, and let
19 me know where you find the word "scandalous" or
20 "embarrassing," please.

21 (Pause.)

22 THE WITNESS: Okay.

23 BY MS. DELGADO:

24 Q. Okay.

25 A. Is there a question? What is the --



1 **A.** Yes. Uh-huh.

2 **Q.** So were you aware that my attorney in
3 2017 offered to file the Complaint with the New
4 York Human Rights Commission under seal?

5 **A.** I don't recall.

6 **Q.** Okay. But you say the campaign -- in
7 paragraph 10 you say the campaign had the belief
8 that I was unwilling to file under seal, correct?

9 **A.** I don't recall.

10 **Q.** Well, but Mr. Glassner, with all due
11 respect, if you don't recall, why would you make
12 the statement in this declaration that was written
13 only last month?

14 **A.** That's my -- that was my recollection
15 of this matter.

16 **Q.** It was your recollection about --

17 **A.** I know. But you're talking about two
18 separate things. In my declaration I say that this
19 is my recollection -- this is what I believe.

20 But I don't recall otherwise. I don't
21 recall any -- I just said I don't recall that
22 offer --

23 **Q.** Okay. When you say that -- Hmm-hmm?
24 Okay.

25 When you say the campaign also



1 believes then -- you know, to make Mr. Gavenman
2 happy, we're talking about 2017; who else was
3 involved in the discussion, because you keep saying
4 "the campaign"?

5 A. I was the representative of the
6 campaign.

7 Q. Who else was involved besides
8 Mr. Rosen?

9 A. Mr. Rosen and myself.

10 Q. Only you two?

11 A. As far as I recall, yes.

12 Q. What about Eric Trump?

13 A. Not to my knowledge.

14 Q. Okay. I'm going to insert here a
15 composite exhibit.

16 (Thereupon, Plaintiff's Exhibit
17 No. 14 was marked for identification.)

18 BY MS. DELGADO:

19 Q. It is a batch of e-mails,
20 Mr. Glassner, between you, Mr. Eric Trump,
21 Mr. Allen Garten, who's Trump Org general counsel,
22 and Larry Rosen. And these have all been
23 previously produced by Mr. Trump. And I'm also
24 going to insert another exhibit.

25 MS. DELGADO: Please mark these



1 established that I object to you asking him
2 about these e-mails and what happens after
3 the filing of this arbitration. As to his
4 motivation when it was filed --

5 MS. DELGADO: So you're not permitting
6 me to ask him about the Trump --

7 MR. GAVENMAN: What's that?

8 MS. DELGADO: -- because the
9 motivation goes to why it went dormant.

10 MR. GAVENMAN: And what happened --

11 MS. DELGADO: Whether it was a good
12 faith --

13 MR. GAVENMAN: -- after it was filed.
14 Okay?

15 MS. DELGADO: Whether it was a good
16 faith filing or not, it directly
17 intertwines with why I say it suddenly went
18 dormant with it and then revived it in
19 December 2019. That reveals whether the
20 motivation cited in this declaration is
21 accurate or not.

22 But you're instructing your client to
23 engage in obstruction and refuse to answer
24 that, and you're refusing as an officer of
25 the court to permit with a series of



1 relevant line of questions.

2 MR. GAVENMAN: No, I'm certainly not.

3 You can ask about --

4 MS. DELGADO: You are.

5 MR. GAVENMAN: -- this as good faith
6 and you can challenge it --

7 MS. DELGADO: But you --

8 MR. GAVENMAN: -- But getting into
9 what happened in 2019 -- and by the way,
10 obviously, there's advice of counsel that
11 mixes into what happened and why it went
12 dormant, so he can't even answer that
13 question. There's -- there is privileged
14 information about what happens afterwards.

15 So not only are we outside the scope,
16 but it's also undoubtedly privileged, so...

17 MS. DELGADO: Mr. Gavenman, I realize
18 I'm a pro se litigant. I realize I'm a
19 woman. I realize I'm Hispanic. But let me
20 explain to you that what he states in his
21 declaration, he doesn't get to hide behind
22 it was my attorney. He's --

23 MR. GAVENMAN: He's not hiding behind
24 his attorney. He's talking about his
25 motivation --



1 MS. DELGADO: Yes, he is. He's said
2 on multiple times --

3 MR. GAVENMAN: -- his understanding.

4 MS. DELGADO: He's been caught
5 perjuring himself and he's done so multiple
6 times in this deposition claim hiding
7 behind his attorney.

8 He didn't have to do this declaration,
9 he chose to. Doesn't say his attorney's
10 name on it. It's not Larry Rosen's name on
11 here, it's Michael Glassner. So he doesn't
12 get to answer and say hide behind, my
13 attorney told me told, but that's what the
14 attorney said. He's saying this. He's
15 saying I violated the NDA.

16 MR. GAVENMAN: Absolutely.

17 MS. DELGADO: He's saying the tweets
18 were improper.

19 MR. GAVENMAN: Please, please ask a
20 question.

21 MS. DELGADO: So let's move on. Let's
22 move on.

23 MR. GAVENMAN: Ask those questions.

24 MS. DELGADO: It's not as if I don't
25 already have everything I need in



1 Q. Right.

2 A. You're talking about the actual
3 lawsuit. Those are two separate things.

4 Q. No --

5 A. I didn't know what was in the lawsuit
6 at the time.

7 Q. Okay. No, sir.

8 This lawsuit was never filed. This is
9 the one that was sent to you and Jones Day and the
10 attorneys. I just want to make clear, I'm not
11 showing you the one that was filed in
12 December 2019. This was a, quote-unquote,
13 threatened lawsuit from March 2017.

14 A. Right. And that's what I'm saying.
15 In my declaration I said that you intended to file
16 it. This is the document. I didn't -- I wasn't
17 aware of the document.

18 Q. Okay. Nonetheless --

19 A. I hadn't seen the document. They are
20 two different things.

21 Q. So you never saw this before the
22 filing?

23 A. Not that I recall.

24 Q. Before the arbitration filing, let me
25 be clear?



1 **A.** I don't -- I don't recall.

2 **Q.** Okay. Let's go through it
3 nevertheless. Would paragraph 1 violate the NDA?

4 MR. GAVENMAN: Objection.

5 BY MS. DELGADO:

6 **Q.** In your opinion, not a legal opinion.

7 **A.** I'm not a lawyer.

8 **Q.** Okay.

9 **A.** So I'm not going to give you a legal
10 opinion.

11 **Q.** I didn't ask for a legal opinion.

12 **A.** Right. But I'm not going to give you
13 an opinion without counsel. This is a legal --

14 **Q.** So you already planted your?

15 **A.** -- document. I'm not a lawyer.

16 **Q.** But you already gave an opinion, sir,
17 in your declaration.

18 So are you taking one position in your
19 declaration and another in this deposition?
20 Because the entire point of this deposition is to
21 talk about your declaration.

22 **A.** Right. But again, I said they are two
23 separate things. In my declaration I said that on
24 March we believed that you intended to file a
25 lawsuit. This is the lawsuit. They are two



1 separate things.

2 Q. But you say that I intended to file a
3 lawsuit with, quote, information concerning the
4 campaign that was not necessary to pursue her legal
5 claims. What's that based on?

6 A. That was I learned that you had
7 threatened to do it. This is the document. They
8 are two separate things.

9 Q. What is the information concerning the
10 campaign that I threatened to divulge that was not
11 necessary to pursue my claim?

12 A. I don't -- sorry, I don't understand
13 the question.

14 Q. Mr. Glassner, you're saying in your
15 declaration that I threatened to file a lawsuit
16 with "information concerning the campaign that was
17 not necessary to pursue by legal claims." What
18 information? Are you claiming now that you never
19 saw a draft?

20 A. I don't recall. Well, I don't
21 understand your question. In my declaration it
22 doesn't say that I saw it. It says that I learned
23 it from counsel presumably.

24 Q. So you greenlit a \$1.5 million
25 arbitration when you had not seen a draft?



1 **A.** I don't recall.

2 **Q.** Let's go through this nonetheless and
3 you tell me whether you believe any of this would
4 violate the NDA or its confidential information.

5 **A.** Again, I'm not a lawyer, and I
6 cannot --

7 **Q.** Well, then how can you just give me --

8 **A.** -- interpret this legal document.

9 **Q.** Okay. I'm not asking you to give
10 legal opinion, and I'll seek sanctions because you
11 went through this in Jessica Denson's deposition,
12 and you went through paragraph by paragraph, so I
13 think it's very clear there's a different position
14 being taken on this one.

15 We're going to go through -- you had
16 no problem giving your opinion then. You're now
17 claiming that that would require a legal opinion,
18 sir? You didn't say it in Denson's deposition.
19 You went through and opined paragraph by paragraph
20 what would be considered disparaging, confidential,
21 et cetera.

22 Why are you refusing to do it in this
23 deposition?

24 **A.** You know, I can do it, but I'm not a
25 lawyer.



1 Q. Sure. I'm not going to hold you to it
2 in the sense of considering your official legal
3 opinion. I want your opinion as the campaign
4 executive at the time. And I realize you're not a
5 lawyer and it's not a legal opinion. So let's go
6 through it.

7 MR. GAVENMAN: Sorry, Ms. Delgado, you
8 wanted him sitting here today. I think
9 that would clarify the matter, and you just
10 put "at the time" in your question.

11 MS. DELGADO: Sorry. Say that again.

12 MR. GAVENMAN: Are you asking his
13 opinion at the time, or are you asking
14 sitting here today?

15 MS. DELGADO: Well, I would --

16 MR. GAVENMAN: And my impression of
17 the question was as we're sitting here
18 today.

19 BY MS. DELGADO:

20 Q. Mr. Glassner, has your opinion changed
21 over time?

22 A. I'm sorry?

23 Q. Does your opinion on these matters
24 change over time?

25 A. I don't recall. This was several



1 years ago, right?

2 Q. Right.

3 A. So I don't remember. So you're
4 asking -- I would defer to my counsel.

5 Are you asking my opinion today?

6 Q. Well, obviously, any opinion given is
7 an opinion in your mind at the time of the
8 deposition. And I guess it's up to reasonable
9 minds to decide whether that would be reflected of
10 your dep -- of your opinion at the time.

11 So you can qualify however you'd like,
12 if you'd would like to say that's my opinion today.

13 A. Okay.

14 Q. So we'll put that qualifier on all
15 just to keep it moving --

16 A. Okay.

17 Q. -- if it's your opinion today. Would
18 this violate -- and, of course, I realize the NDA
19 is no longer in place. So as if the NDA were still
20 in place, if it had not been kicked out by a court,
21 would this violate the NDA, paragraph 1?

22 A. Well, I don't -- I don't know if
23 anything that's alleged here is true. I wasn't
24 involved. I don't know if you were stripped,
25 isolated, or denied a job. I wasn't involved in



1 that.

2 Q. Would making this statement violate
3 the NDA?

4 A. Presumably, yes. Yes.

5 Q. Would it be that confidentiality
6 and/or the non-disparagement?

7 A. Confidentiality.

8 Q. Okay. Let's move on to 2.

9 A. Yeah, that violates confidentiality.

10 Q. What part of that do you think would
11 violate confidentiality?

12 A. It describes internal conversations in
13 the campaign. Private conversations.

14 Q. So a conversation between myself and
15 the person whose child I'm carrying would be
16 considered confidential information the campaign
17 owns?

18 MR. GAVENMAN: Objection.

19 THE WITNESS: You were both employees
20 of the campaign.

21 BY MS. DELGADO:

22 Q. What about 3?

23 A. Yeah, it -- it violates internal
24 campaign conversations that were confidential.

25 Q. What about 4?



1 **A.** Yeah, again, presumably it highlights
2 internal, you know, confidentiality campaign
3 decision-making.

4 **Q.** What about 5?

5 **A.** Yes, same.

6 **Q.** 6?

7 **A.** I can't -- no, because it doesn't
8 involve the campaign.

9 **Q.** What about 7?

10 **A.** Same. It doesn't involve the
11 campaign.

12 **Q.** What about 8?

13 **A.** Yeah, again, it doesn't involve the
14 campaign.

15 **Q.** We'll skip through 9, if you agree
16 with me on that 9, because it seems that they
17 appear to just list the parties.

18 **A.** Okay.

19 **Q.** So -- okay. Let's go to 16.

20 **A.** Yeah, that's just biographical.

21 **Q.** Okay. 17?

22 **A.** Same.

23 **Q.** 18?

24 **A.** Same.

25 **Q.** 19?



1 A. Yes, that violates confidentiality.

2 Q. How so?

3 A. Internal communications.

4 Q. Where is the internal communication?

5 A. Presumably from Mr. Trump to you.

6 Q. Where is this -- are you reading
7 paragraph 20?

8 A. 19.

9 Q. Oh, you're on 19. Okay.

10 A. Yeah, again, those are internal
11 confidential conversations.

12 Q. But was I working for the campaign in
13 that time period?

14 A. I don't recall.

15 Q. Okay. If I were to tell you I was
16 working for the campaign officially starting in
17 August, why would conversations, messages from
18 Mr. Trump in the spring of 2015 be confidential?

19 A. Oh, okay. Yeah, I didn't recall the
20 dates.

21 Q. Okay. So then no, okay?

22 A. Right.

23 Q. Okay. That paragraph is okay.

24 Okay. What about 20?

25 A. I don't know the context to these



1 comments, are they public or not public?

2 Q. If they were internal, they would
3 be -- it would be a violation to list them in a
4 filing?

5 A. Yes.

6 Q. 21?

7 A. Same. That doesn't appear to involve
8 the campaign.

9 Q. That one is okay?

10 A. Yeah.

11 Q. 22?

12 A. I mean, this is all just biographical,
13 so no.

14 Q. Okay. If you want, we can skip
15 through -- well, 22 is also biographical, but I
16 don't want to put words in your mouth, so feel free
17 to answer it.

18 A. Yeah, it is.

19 Q. Okay. 23?

20 A. It looks like a public declaration.

21 Q. So okay.

22 A. Yes.

23 Q. 24?

24 A. Yes.

25 Q. Meaning okay?



1 A. Yeah, it's fine.

2 Q. Okay. 25?

3 A. Yes, that's a violation of internal
4 communications.

5 Q. 26?

6 A. Yeah, again, biographical.

7 Q. 27?

8 A. Yes, that violates internal campaign
9 strategies.

10 Q. 28?

11 A. That's biographical.

12 Q. 29?

13 A. Yes, that violates internal strategy
14 communications.

15 Q. 30?

16 A. Yes, that's internal communications.

17 Q. 31?

18 A. Same, that's disclosure of internal
19 communications.

20 Q. 32?

21 A. Yes, that involves internal
22 communications.

23 Q. 33?

24 A. Again, this is -- I can't really
25 determine if it does or not because this is your



1 assertion. I don't know if this is factual or not.

2 Q. Understood. That's fair.

3 Assuming it is, would it be a
4 violation?

5 A. Yes.

6 Q. 34?

7 A. Same.

8 Q. Violation?

9 A. It's your recollection, there's no --
10 you know, I don't know if this is factual or not.

11 Q. I understand the qualifier. I'm not
12 saying that by your saying they are confidential
13 that you are admitting this is true. Understood?

14 A. Okay.

15 Q. I just -- presumably if it's true.

16 A. If it were true, yes, it would violate
17 internal strategies.

18 Q. 35?

19 A. Yes.

20 Q. 36?

21 A. Yes.

22 Q. 37?

23 A. Yes.

24 Q. Communications, confidentiality?

25 A. Yes. Communications, yeah. I guess



1 when I say "yes," I'm saying yes, it violates the
2 NDA.

3 Q. Okay. Thanks for clarifying.

4 Okay. 38?

5 A. Yes.

6 Q. 39?

7 A. Yes.

8 Q. 40?

9 A. Yes.

10 Q. 41?

11 A. Yes.

12 Q. 42?

13 A. Yes.

14 Q. 43?

15 A. Yes.

16 Q. 44?

17 A. Yes.

18 Q. 45?

19 A. Yes.

20 Q. 46?

21 A. Yes.

22 Q. 47?

23 A. Yes.

24 Q. 48?

25 A. Yes.



1 Q. 49?

2 A. Yes.

3 Q. 50?

4 A. Yes.

5 Q. 51?

6 A. Yes.

7 Q. 52?

8 A. Yes.

9 Q. 53?

10 A. That's, you know, just speculation.

11 That's biographical.

12 Q. Okay. 54?

13 A. Same. Biographical.

14 Q. That one would not violate?

15 A. It's not -- it's not involving the
16 campaign. This appears to be personal matters.

17 Q. But you said earlier, though, that the
18 conversation between Miller and myself because we
19 were both campaign employees about the pregnancy
20 was considered confidential.

21 MR. GAVENMAN: Objection.

22 BY MS. DELGADO:

23 Q. Is it not?

24 A. Yeah, this is the same. It's, you
25 know, presumably conversations between colleagues.



1 Q. So put this in the violates camp?

2 A. Yeah.

3 Q. Okay. 55?

4 A. Same. Wait. Yes.

5 Q. "Yes" meaning violates?

6 A. Yes.

7 Q. Okay. 56?

8 A. Yes.

9 Q. 57?

10 A. Yes.

11 Q. 58?

12 A. No.

13 Q. Okay. 59?

14 A. Yes.

15 Q. 60?

16 A. Yes.

17 Q. Even though that's not relaying a
18 conversation or internal communication, why would
19 that violate?

20 A. Number 60?

21 Q. Yes, sir.

22 A. Because those are -- presumably those
23 conversations and that decision was internal
24 strategic matter.

25 Q. 61?



1 **A.** I don't -- there's no -- I don't see
2 the involvement in the campaign in that, so no.

3 **Q.** But 61 is pretty much what your
4 declaration in paragraph 10 says was the cause of
5 my --

6 **A.** I should -- I'll read it again.

7 Yes.

8 **Q.** That violates the NDA?

9 **A.** Yeah. Yes.

10 **Q.** Okay. 62?

11 **A.** Yes.

12 **Q.** 63?

13 **A.** Yes.

14 **Q.** So let me ask you about 63.

15 Mr. Spicer is not a campaign employee, so what's
16 your basis for 63 being confidential?

17 **A.** I didn't recall that, so presumably
18 he's not cover -- that's not covered. So yes, I --
19 it's not -- I don't recall Mr. Spicer's exact role.

20 **Q.** 64?

21 **A.** Yeah, I guess it would be the same.

22 He's not -- if he's not a -- if he wasn't a
23 campaign official at the time.

24 **Q.** 65?

25 **A.** Same.



1 I mean, now I have a deponent who's,
2 quite in contrast to another deposition,
3 that declared that he's not answering a
4 hypothetical. That's a first.

5 BY MS. DELGADO:

6 Q. Mr. Glassner, just on the last
7 question you answered about Cliff Sims, et cetera,
8 just to be extra clear, I know you stated you made
9 the decision in my case to move forward along with
10 Larry Rosen. Did -- was it the same individual
11 making the decisions in those as well, was it you
12 and Mr. Rosen?

13 MR. GAVENMAN: Objection. That's
14 outside the scope. Other than that
15 Mr. Glassner was involved, who else was
16 involved is outside the scope of this
17 deposition.

18 MS. DELGADO: Oh, that was already
19 asked and discussed. I think it's clear
20 from the documents. I don't even need his
21 answer on that. Eric Trump was clearly
22 involved. I'm not asking him that.

23 I'm asking him who was giving the
24 green light for the others? Was it also
25 Mr. Glassner? He said in his deposition



1 CERTIFICATE OF SHORTHAND REPORTER

2 STATE OF FLORIDA)
3) SS.
4 COUNTY OF MIAMI-DADE)

5 I, Elena Robaina, Florida Professional
6 Shorthand Reporter, do hereby certify that I was
7 authorized to and did stenographically report the
8 deposition of MICHAEL GLASSNER; and that the
9 foregoing transcript, pages 1 through 196, is a
10 true record of my stenographic notes.

11 I further certify that the said witness was
12 duly sworn according to law.

13 I further certify that I am not of counsel
14 to either of the parties to set cause or otherwise
15 interested in the action.

16 In witness whereof, I here unto set my hand
17 and affix my official seal this
18 November 7, 2024.

19
20 

21 _____
22 Elena Robaina
23 Florida Professional Reporter
24
25

